

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

CHILDREN’S HEALTH DEFENSE, )  
ROBERT F. KENNEDY, JR., TRIALSITE, )  
INC., CREATIVE DESTRUCTION )  
MEDIA, LLC, ERIN ELIZABETH FINN, )  
JIM HOFT, DR. BEN TAPPER, BEN )  
SWANN, DR. JOSEPH MERCOLA, TY )  
BOLLINGER & CHARLENE )  
BOLLINGER, )

*Plaintiffs,*

v.

WP COMPANY LLC D/B/A THE )  
WASHINGTON POST, THE BRITISH )  
BROADCASTING CORP., THE )  
ASSOCIATED PRESS, & REUTERS, )

*Defendants.*

Civil Action No. 2:23-cv-00004-Z

**THE ASSOCIATED PRESS, REUTERS NEWS & MEDIA INC.,  
AND WP COMPANY LLC’S MOTION TO TRANSFER**

Pursuant to 28 U.S.C. § 1404, the Associated Press, Reuters News & Media Incorporated, and WP Company LLC d/b/a The Washington Post (collectively, “Defendants”) request this Court transfer Plaintiffs’ lawsuit to the United States District Court for the Southern District of New York or the United States District Court for the District of Columbia.

A brief in support of this motion, setting forth the argument and authorities upon which Defendants rely, is filed simultaneously under separate cover pursuant to Local Rule 7.1. The matters required under Local Rule 7.2 are set forth in the brief.

WHEREFORE, Defendants respectfully request the Court transfer this case to the United States District Court for the Southern District of New York or the United States District Court for the District of Columbia.

Dated: April 18, 2023

Respectfully submitted,

/s/ Leslie E. John

Leslie E. John (*pro hac vice*)  
johnl@ballardspahr.com  
Elizabeth P. Weissert (*pro hac vice*)  
weisserte@ballardspahr.com  
Kayla R. Martin (*pro hac vice*)  
martinkr@ballardspahr.com  
Ballard Spahr LLP  
1735 Market Street, 51st Floor  
Philadelphia, PA 19103  
Tel: (215) 665-8500; Fax: (215) 864-8999

Jay Ward Brown (*pro hac vice*)  
brownjay@ballardspahr.com  
Ballard Spahr LLP  
1909 K Street N.W., 12th Floor  
Washington, D.C. 20006  
Tel: (202) 661-2200; Fax: (202) 661-2299

Timothy C. Williams (SBN 24067940)  
tim.williams@sprouselaw.com  
Sprouse Shrader Smith PC  
701 S Taylor Street, Suite 500  
Amarillo, TX 79101  
Tel: (806) 468-3346; Fax: (806) 373-3454

*Attorneys for The Associated Press*

/s/ Justina Sessions

Justina Sessions (*pro hac vice pending*)  
jsessions@wsgr.com  
Wilson Sonsini Goodrich & Rosati  
One Market Plaza, 1 Market Street Suite 3300  
San Francisco, CA 94105  
Tel: (415) 947-2000; Fax: (650) 493-6811

Jeffrey C. Bank (*pro hac vice pending*)  
jbank@wsgr.com  
Wilson Sonsini Goodrich & Rosati  
1700 K Street, N.W., 5th Floor  
Washington, D.C. 20006  
Tel: (202) 973-8800; Fax: (202) 973-8899

/s/ John E. Schmidtlein

John E. Schmidtlein (*pro hac vice*)  
jschmidtlein@wc.com  
Thomas G. Hentoff (*pro hac vice*)  
thentoff@wc.com  
Nicholas G. Gamse (*pro hac vice*)  
ngamse@wc.com  
Kathryn E. Garza (*pro hac vice*)  
kgarza@wc.com  
Williams & Connolly LLP  
680 Maine Avenue, S.W.  
Washington, D.C. 20024  
Tel: (202) 434-5000; Fax: (202) 434-5029

Thomas C. Riney (SBN 16935100)  
tom.riney@uwlaw.com  
C. Jason Fenton (SBN 24087505)  
jason.fenton@uwlaw.com  
Underwood Law Firm, P.C.  
500 S. Taylor Street, Suite 1200  
Amarillo, TX 79101  
Tel: (806) 379-5613; Fax: (806) 379-0316

*Attorneys for WP Company LLC*

David M. Russell (SBN 17409300)  
david@srlawtx.com  
Smithee & Russell, LLP  
320 S. Polk Street, Suite 920  
Amarillo, TX 79101  
Tel: (806) 322-9200; Fax: (806) 322-9201

*Attorneys for Reuters News & Media Inc.*

**CERTIFICATE OF SERVICE**

The undersigned Counsel hereby certifies that on the 18th day of April 2023, notice of the foregoing pleading was provided via the CM/ECF system to the counsel of record. In addition, notice was provided via email to the following counsel.

Jed Rubenfeld  
rubenfeldjed@gmail.com  
1301 Forest Road  
New Haven, CT 06515

/s/ John Schmidlein

John E. Schmidlein